

United States Bankruptcy Court
Eastern District of Pennsylvania
Bankruptcy Clerk of Courts
900 Market Street, Suite 400

Johnnie M. Berry Debtor

And

William C. Miller, Esquire Trustee

v.

U.S. Bank Trust National Association, as
Trustee of the SCIG Series III Trust
Movant

Chapter 13

Case 14-18431-elf

Doc 71

Filed 6/17/2020

Court Hearing scheduled to be heard by the
Honorable Judge Eric L. Frank on July 14,
2020 at 9:30 am. Courtroom #1

I, Johnnie M. Berry am the debtor in this action, and I respectfully submit this affirmation in opposition to the motion for relief from stay filed on 06/17/2020 by the U.S. Bank Trust National Association, as Trustee of the SCIG Series III Trust for Relief from the Automatic Stay as to certain realty known as 852 West Cobbs Creek Parkway, Lansdowne, PA 19050

1. Agree

2. Agree

3. Agree

4. Agree

5. Agree

6. Agree

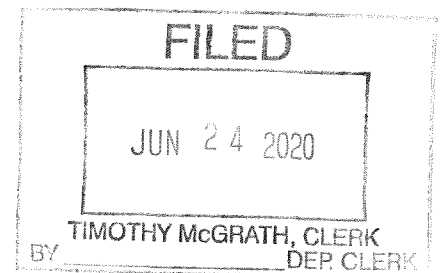
7. Agree

8. Agree

9. Agree

10. Disagree. Mortgage payments have been made consistently to BSI Financial services since they were assigned my mortgage since 04/2018 to present with a June 2020 payment being due.

11. Disagree. I was unaware of the post-petition arrears in the amount of \$6,130.69 due to this amount not showing on my monthly statements from the Movant. Accompanying my response to the motion is my Bank of America bank records showing I, Johnnie M. Berry made four (4)



payments in the amount of \$1238.44 for the periods between January 01, 2020 to April ,2020. A payment of \$1,241.26 was sent in May 2020 due to a letter received by the Movant noting an increase in my monthly mortgage payment (please review accompany Bank of America Statement).

A payment of \$1,241.26 for the month of June is scheduled to be sent to BSI Financial services on 06/26/2020 through debtor's Bank of America checking account which will make the account with BSI Financial Services current.

12. Disagree. Debtor's last payment was sent and received by BSI Financial services on May 22, 2020 in the amount of \$1,241.26 (please review accompany Bank of America Statement).

13. Disagree. Summary of the debtor's post-petition payment history is incorrect.

14. Disagree. Debtor only owes mortgage payment for June 2020 in the amount of \$1,241.26.

15. Agree

16. Agree

17. Agree

18. No Comment

19. Disagree

20. Disagree. Mortgage payments have been sent to BSI Financial Services and received by the mortgage company since May 2020. This is evident by the debtor's Bank of America Bank checking account statements since April of 2018.

21. Disagree

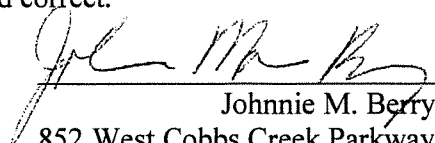
22. Disagree. There is no reason for the court filing since monthly mortgage payments have been made.

23. Agree.

In view of the foregoing, it is respectfully submitted that the motion for relief from stay should be denied.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2020


Johnnie M. Berry
852 West Cobbs Creek Parkway
Lansdowne, PA 19050

6/21/2020

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Bank of America | Online Banking | Bill Pay | Payment Activity

Date Range

Past 12 months

Jun 22, 2019 and future

Filter By

All

Select from list

☐ eBills Only

Showing BSI financial services payments. Clear Filter

Showing 1 - 14 of 14 payments

page 1

Description	Amount	Deliver By	Status
BSI financial services Mortgage *4159	\$1,241.26 ADV PLUS BANKING *9158	7-31-20	Scheduled Cfm # QFXZO-NNC8W
BSI financial services Mortgage *4159	\$1,241.26 ADV PLUS BANKING *9158	6-30-20	Canceled Cfm # QFXYD-W03BD
BSI financial services Mortgage *4159	\$1,241.26 ADV PLUS BANKING *9158	6-26-20	Scheduled Cfm # QG2Z5-HKV77
BSI financial services Mortgage *4159	\$1,241.26 ADV PLUS BANKING *9158	5-22-20	Processed Cfm # Q94K6-GTD67
BSI financial services Mortgage *4159	\$1,238.44 ADV PLUS BANKING *9158	4-24-20	Processed Cfm # Q7HL2-1Z4VM
BSI financial services Mortgage *4159	\$1,238.44 ADV PLUS BANKING *9158	3-27-20	Processed Cfm # PXF8W-QTTV9
BSI financial services Mortgage *4159	\$1,238.44 ADV PLUS BANKING *9158	2-28-20	Processed Cfm # PXF79-NPD8J
BSI financial services Mortgage *4159	\$1,238.44 ADV PLUS BANKING *9158	1-31-20	Processed Cfm # PT8V3-JW4HW
Total	\$14,890.56		Scheduled, In Process, and Processed payments only, including any fees.